

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re: _____)
_____) Case No. 20-30663
The Roman Catholic Diocese of Syracuse, _____)
New York _____) Chapter 11
Debtor. _____)

**NOTICE OF APPEARANCE AND REQUEST FOR
NOTICE AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned appears for Merchants Mutual Insurance Company, pursuant to Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”) 2002(g) and 2002(h), 9007 and 9010(b) and Section 1109(b) of the Bankruptcy Code, and demands that all notices that are required to be given in this case, and all papers that are required to be served in this case, be given to and served upon the undersigned pursuant to Bankruptcy Rule 2002(g) at the office, addresses, and telephone number set forth below, and that the undersigned be added to the mailing matrix on file with the Clerk of the Bankruptcy Court as follows:

Brian D. Barnas
Hurwitz & Fine, P.C.
1300 Liberty Building
Buffalo, NY 14202
Telephone: (716) 849-8900
Facsimile: (716) 855-0874
[Email: bdb@hurwitzfine.com.com](mailto:bdb@hurwitzfine.com.com)

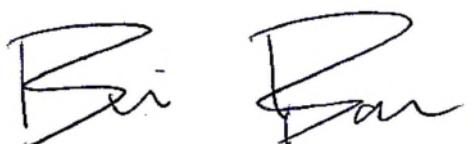
PLEASE TAKE NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above,

but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise, which affect or seek to affect in any way Merchants Mutual's rights or interests.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance and Request for Notice and Service of Papers ("Notice") nor any later appearance, pleading, proof of claim, claim, or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) the right to trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case; (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice; (v) an election of remedy; or (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: March 2, 2021

HURWITZ & FINE, P.C.

Two handwritten signatures are shown side-by-side. The signature on the left is "B" and the signature on the right is "D".

By: _____
Brian D. Barnas, Esq.
1300 Liberty Building
Buffalo, NY 14202
Telephone: (716) 849-8900
Facsimile: (716) 855-0874
Email: bdb@hurwitzfine.com

*Attorneys for Merchants Mutual Insurance
Company*